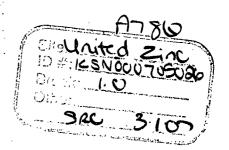
TETRA TECH EM INC.

March 1, 2007

Mr. Roy Crossland START Project Officer U.S. Environmental Protection Agency, Region 7 901 North 5th Street Kansas City, Kansas 66101



Subject:

Quality Assurance Project Plan

United Zinc No. 1, Iola, Kansas

U.S. EPA Region 7, START 3, Contract No. EP-S7-06-01

Task Order No. 0038.000

Task Monitor: Paul Roemerman, EPA Site Assessment Team Leader

Dear Mr. Crossland:

Tetra Tech EM Inc. is submitting the attached Quality Assurance Project Plan for Site Investigation activities at the United Zinc No. 1 site in Iola, Kansas. If you have any questions or comments, please contact me at (913) 495-3920.

Sincerely,

Stephanie Luebbering, CHMM

START Project Manager

Ted Faile, PG, CHMM START Program Manager

Enclosures



QUALITY ASSURANCE PROJECT PLAN (FOR SITE INVESTIGATION ACTIVITIES UNITED ZINC NO. 1 IOLA, KANSAS

CERCLIS ID: KSN000705026

Superfund Technical Assessment and Response Team (START) 3 Contract No. EP-S7-06-01, Task Order 0038.000

Prepared For:

U.S. Environmental Protection Agency Region 7 Superfund Division 901 North 5th Street Kansas City, Kansas 66101

February 28, 2007

Prepared By: Tetra Tech EM Inc. 8030 Flint Street Lenexa, Kansas 66214 913-894-2600

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A FIGURES

Region 7 Superfund Program Addendum to the QAPP for Superfund Integrated Site Assessment and Targeted Brownfields Assessment Activities (July 2005) for the United Zinc No. 1 Site **Project Information:** Site Name: United Zinc No. 1 City: Iola State: Kansas START Project Manager: Stephanie EPA Project Manager: Paul Roemerman Luebbering Mophanee Approved By: Prepared For: EPA Region 7 Superfund Title: Dates Division START Project Manager Approved By: Title: START Program Manager Date: Approved By: Prepared By: Stephanie Luebbering athleen ton Title: Date: Date: 2/27/2007 Approved By: Title: PA Project Manager Date: Tetra Tech START Project Number: Approved By: inno Manus X9004.06.0038.000 Title: EPA Region 7 QA Coordinator Date: 03/09/2007 1.0 **Project Management:** Distribution List EPA-Region 7: Paul Roemerman, EPA Project Manager Tetra Tech START: Stephanie Luebbering, Project Manager Diane Harris, EPA Region 7 QA Coordinator Project/Task Organization Paul Roemerman, of the EPA Region 7 Superfund Division, will serve as the EPA project manager for the activities described in this QAPP. Stephanie Luebbering, of Tetra Tech EM Inc. (Tetra Tech), will serve as the START project manager. Problem Definition/Background: Description: This site-specific Quality Assurance Project Plan form is prepared as an addendum to the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program (updated July 2005), and contains site-specific data quality objectives for the sampling activities described herein. Description attached. Description in referenced report: Title Date Project/Task Description: 1.4 CERCLA SI **Brownfields Assessment** $\overline{\boxtimes}$ Other (description attached): Pre-CERCLIS Site Screening Removal Assessment Schedule: Field work is scheduled for March 2007. Description in referenced report: Date Quality Objectives and Criteria for Measurement Data: Accuracy: Identified in attached table. Precision: Identified in attached table. Representativeness: Identified in attached table. Completeness*: Identified in attached table. Comparability: Identified in attached table. Other Description: *A completeness goal of 100 percent has been established for this project. However, if the completeness goal is not met, EPA may still be able to make site decisions based on any or all of the remaining validated data. Special Training/Certification Requirements: \boxtimes Special Equipment/Instrument Operator (describe below): **OSHA 1910** Other (describe below): Monitoring wells will be installed by a subcontractor.

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Region 7 Superfund Program Addendum to the QAPP for Superfund Integrated Site Assessment and Targeted Brownfields Assessment Activities (July 2005) for the United Zinc No. 1 Site										
1.7 Documentation and Records:										
	Site Log ☐ Trip Report ☐ Site Maps ☐ Video ☐ Health and Safety Plan ☐ Letter Report ☐ Photos									
	 ✓ Sample documentation will follow EPA Region 7 SOP 2420.05D. ✓ Other: Analytical information will be handled according to procedures identified in Table 2. 									
	2.0	Measu	rement and Data Acquisitio	n:						
2.1 Sampling Process Design:	•									
□ Random Sampling □ Transect Sampling □ Biased/Judgmental Sampling □ Stratified Random Sampling □ Search Sampling □ Systematic Grid □ Systematic Random Sampling □ Definitive Sampling □ Screening w/o Definitive Confirmation □ Screening w/ Definitive Confirmation □ Sample Maps Attached □ Other (Provide rationale behind each sample): See Attachment A for additional sampling information.										
procedures included in the Guidan Program Representative Sampling by the EPA Region 7 laboratory. S	The proposed sampling scheme for groundwater from monitoring wells will be biased/judgmental, with definitive laboratory analysis, in accordance with procedures included in the Guidance for Performing Site Inspections Under CERCLA, OSWER Directive #9345.1-05, September 1992, and Removal Program Representative Sampling Guidance, Volume 1: Soil, OSWER Directive 9360.4-10, November 1991. All samples will be submitted for analysis by the EPA Region 7 laboratory. See Appendix A for additional site-specific information and maps. The proposed number of samples is a balance between cost and coverage, and represents a reasonable attempt to meet the study objectives while staying within the budget constraints of a typical site investigation.									
Sample Summary Location	SAME AND A STATE OF THE SAME A	Matrix	2000年12日本《大学大学报》(1957年	395%	# of Samples*	Analysis				
Private drinking water wells		Groundw	ater		5	Arsenic and lead				
Surface water intakes		Surface w	vater		3	Arsenic and lead				
Surface soil		Soil			5	Arsenic and lead				
Off-site surface water bodies		Surface w	vater		6	Arsenic and lead				
Off-site surface water bodies		Sediment			6	Arsenic and lead				
*NOTE: Background/QC samples	are not included with th			ample		Auseine and lead				
2.2 Sample Methods Requirer		iese totals.	see rable 1 tot a complete s	ample	summa y.					
Matrix	Sampling Method				EPA Region 7 SOP(s)	& Methods				
Groundwater – Private drinking water wells	ng water vor to any to iate contain of 5 minutes	ellected directly into sample wells at spigots/faucets closest reatment. The samples will be ners after the wells have been ates and field water quality	e	SOP 4230.10A						
Surface water – Public water ntakes Surface water – Public water ntakes Surface water samples will be collected directly into sample containers from the surface water intake taps/spigots prior to any treatment. The samples will be collected into appropriate containers after the intakes have been purged for a minimum of 5 minutes and field water quality parameters have stabilized. SURFACE water samples will be collected directly into sample containers from the surface water intake taps/spigots prior to any treatment. The samples will be collected into appropriate containers after the intakes have been purged for a minimum of 5 minutes and field water quality parameters have stabilized.						,				
Soil	Surface sail samples will be collected with disposable stainless					SOP 4331.2012				
Water – Surface water Surface water samples will be collected directly into appropriate containers from Rock Creek, Elm Creek, and the Neosho River.				SOP 4230.17A						
Sediment samples will be co-located with the surface water samples and will be collected from the top 2 inches of stream sediment using a clean, dedicated, stainless steel spoon in a dedicated container. SOP 4230.08A										
2.3 Sample Handling and Custody Requirements:										
Samples will be packaged and preserved in accordance with procedures defined in Region 7 EPA SOP 2420.06D. COC will be maintained as directed by Region 7 EPA SOP 2420.04C. Samples will be accepted according to Region 7 EPA SOP 2420.01E. Other (Describe):										

	Region 7 Superfund Program Addendum to the QAPP for Superfund Integrated Site Assessment and Targeted Brownfields Assessment Activities (July 2005) for the United Zinc No. 1 Site
2.4	Analytical Methods Requirements:
⊠ ⊠ sites	
	Other (Describe):
2.5	Quality Control Province anto
1	Quality Control Requirements:
	Not Applicable Identified in attached table
×	In accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program
(upd	ated July 2005).
intro blanl Anal indic	Field QC Samples: For this investigation, field QC samples will include a field blank prepared with DI water provided by the EPA Region 7 atory. The field blank will be collected to evaluate contamination of sampling containers and/or preservatives and to assess contamination potentially duced during the sampling and laboratory procedure(s). All QC samples will be submitted for the analyses listed in the attached tables. Evaluation of a samples depends on the levels of contamination found in environmental samples to determine whether the environmental samples are representative, ytical results of blank samples will be evaluated on a qualitative basis by the EPA project manager and EPA contractor(s) to determine a general atton of field-introduced and/or lab-introduced contamination. Total method precision is not required for this event; therefore, field duplicates will be collected.
_	Other (Describe):
2.6	Instrument/Equipment Testing, Inspection, and Maintenance Requirements:
	Not Applicable
\boxtimes	In accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program
	other (Describe): Testing, inspection, and maintenance of field instruments (GPS unit, water quality meter, etc.) will be performed in accordance
with	manufacturers' recommendations. Testing, inspection, and maintenance of laboratory equipment will be performed in accordance with the previously
refere	med SOPs and/or manufacturers' recommendations.
2.7	Instrument Calibration and Frequency:
\boxtimes	Not Applicable Inspection/acceptance requirements are in accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and ted Brownfields Assessment Program (updated July 2005).
\boxtimes	Calibration of laboratory equipment will be performed as described in the previously referenced SOPs and/or manufacturers' recommendations
recon	Other (Describe): Calibration of field instruments (water quality meter, etc.) will be performed daily, as described in the manufacturers' imendations.
2.8	Inspection/Acceptance Requirements for Supplies and Consumables:
	Not Applicable
⊠ (Unda	In accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program ated July 2005).
	All sample containers will meet EPA criteria for cleaning procedures for low-level chemical analysis. Sample containers will have Level II
certifi	cations provided by the manufacturer in accordance with pre-cleaning criteria established by EPA in Specifications and Guidelines for Obtaining
	minant-Free Containers. Other (Describe):
2.9	Data Acquisition Requirements:
	Not Applicable
	n accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program
(updat	ed July 2005).
⊠ I	Previous data/information pertaining to the site (including other analytical data, reports, photos, maps, etc., which are referenced in this QAPP) have compiled by EPA and/or its contractor(s) from other sources. Some of that data has not been verified by EPA and/or its contractor(s); however, the
inform	nation will not be used for decision-making purposes by EPA without verification by an independent professional qualified to verify such
data/ir	formation.
	Other (Describe): Data Management:
	•
	All laboratory data acquired will be managed in accordance with Region 7 EPA SOP 2410.01E. Other (Describe):
	3:0 Assessment and Oversight.
3.1	Assessment and Response Actions:
	eer Review 🔲 Management Review 🔲 Field Audit 🔲 Lab Audit
	Assessment and response actions pertaining to analytical phases of the project are addressed in Region 7 EPA SOPs 2430.05C and 2430.12E.

Region 7 Superfund Program Addendum to the QAPP for Superfund Integrated Site Assessment and Targeted Brownfields Assessment Activities (July 2005) for the United Zinc No. 1 Site						
3.1A Corrective Action:						
☐ Corrective actions will be taken at the discretion of the EPA project manager whenever there appear to be problems that could adversely affect data quality and/or resulting decisions affecting future response actions pertaining to the site. ☐ Other (Describe):						
3.2 Reports to Management:						
☐ Audit Report ☐ Data Validation Report ☐ Project Status Report ☐ None Required						
A letter report describing the sampling techniques, locations, problems encountered (with resolutions to those problems), and interpretation of analytical results will be prepared by START and submitted to the EPA. Reports will be prepared in accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program (updated July 2005). Other (Describe):						
4.0 Data Validation and Usability:						
4.1 Data Review, Validation, and Verification Requirements: ☐ Identified in attached table ☐ Data review and verification will be performed in accordance with the Generic Quality Assurance Project Plan for Superfund Integrated Assessment and Targeted Brownfields Assessment Program (updated July 2005). ☐ Data review and verification will be performed by a qualified analyst and the laboratory's section manager as described in Region 7 EPA SOPs 2430.05C and 2430.12E. ☐ Other (Describe):						
4.2 Validation and Verification Methods: ☐ Identified in attached table ☐ The data will be validated in accordance with Region 7 EPA SOPs 2430.05C and 2430.12E. ☐ The EPA project manager will inspect the data to provide a final review. The EPA project manager will review the data, if applicable, for laboratory spikes, laboratory blanks, and the field blank to ensure that they are acceptable. The EPA project manager will also compare the sample descriptions with the field sheets for consistency and will ensure that any anomalies in the data are appropriately documented. ☐ Other (Describe):						
4.3 Reconciliation with User Requirements:						
☐ Identified in attached table ☐ If data quality indicators do not meet the project's requirements as outlined in this QAPP, the data may be discarded and re-sampling or re-analysis of the subject samples may be required by the EPA project manager. ☐ Other (Describe):						
· ·						

	Addendum to th	e QAPP for Supe	erfund Intégrated Sit	on 7 Superfund Prog te Assessment and Ta he United Zinc No. 1	argeted Brownfiel	ds Assessment A	ctivities (July 2005)
				ble 1: Sample Summ			±
Site Name	e: United Zir	ic No. I		Location: Iola, Kan			
		: Stephanie Luebl	bering	Activity/ASR #: To		Date	: February 27, 2007
No. of Samples	Matrix	Location	Purpose	Depth or other Descriptor	Requested Analysis	Sampling Method	Analytical Method/SOF
5	Groundwater	Private drinking water wells	To assess potential groundwater contamination from site operations	Unknown	Arsenic and lead	EPA SOP 4230.10A	EPA Method 6020
3	Drinking water from surface water source	Spigot from surface water intakes	To assess potential surface water (drinking water) contamination from site operations	Unknown	Arsenic and lead	EPA SOP 4230.10A	EPA Method 6020
5	Surface water	Surface water bodies near the site	To assess potential surface water contamination from site operations	N/A	Arsenic and lead	EPA SOP 4230.17A	EPA SOP 3122.03B
5	Sediment	Collocated with surface water samples	To assess potential sediment contamination from site operations	0-6 inches	Arsenic and lead	EPA SOP 4230.08A	EPA SOP 3122.03B
				Background Samples			
I	Groundwater	Private drinking well upgradient of the site	To determine background level of contaminants of concern in groundwater	Unknown	Arsenic and lead	EPA SOP 4230.10A	EPA Method 6020
1	Drinking water from surface water source	Spigot from surface water intake upgradient of site	To determine background level of contaminants of concern in surface water (drinking water source)	Unknown	Arsenic and lead.	EPA SOP 4230.10A	EPA Method 6020
5	Soil	Surface soil samples upgradient of the site	To determine background level of contaminants of concern in surface soil	0-2 inches	Arsenic and lead	EPA SOP .4231.2012	EPA SOP 3122.03B
1	Surface water	Surface water sample upgradient of the site	To determine background level of contaminants of concern in surface water	N/A	Arsenic and lead	EPA SOP 4230.17A	EPA SOP 3122.03B
1	Sediment	Co-located with surface water sample	To determine background level of contaminants of concern in sediment	0-6 inches	Arsenic and lead	EPA SOP 4230.08A	EPA SOP 3122.03B

Region 7 Superfund Program Addendum to the QAPP for Superfund Integrated Site Assessment and Targeted Brownfields Assessment Activities (July 2005) for the United Zinc No. 1 Site									
	Table 1: Sample Summary (continued)								
Site Name:	Site Name: United Zinc No. 1 Location: Iola, Kansas								
START Project Manager: Stephanie Luebbering Activity/ASR #: To be determined Date: Febr				ebruary 27, 2007					
No. of Samples	Matrix	Location	Purpose	Depth or other Descriptor	Requested Samplin		0	Analytical Method/SOP	
QC Samples									
1	Water	Field blank	To assess field/laboratory-introduced contamination	N/A	Arsenic and lead	N/A		EPA Method 6020	

	Region 7 Superfund Program Addendum to the QAPP for Superfund Integrated Site Assessment and Targeted Brownfields Assessment Activities (July 2005) for the United Zinc No. 1 Site										
	Table 2: Data Quality Objective Summary										
Site Name: United Zinc No. 1 Location: Iola, Kansas											
START Project Manager: Stephanie						Date: Februa	Date: February 27, 2007				
	Analytical	1		Data Quality Me	easurements		Sample	Data Management Procedures			
Analysis	Method	Accuracy	Precision	Representativeness	Completeness	Comparability /	~ 1				
	WATER (Groundwater and Surface Water)										
Arsenic and lead	see Table	per analytical method	per analytical method	biased/judgmental sampling based on professional judgment of the sampling team	100%; samples from private drinking water wells and surface water intakes are considered critical samples	Standardized procedures for sample collection and analysis will be used.	See Section 2.3 of QAPP form.	See Section 2.10 of QAPP form.			
				SOIL/SI	EDIMENT						
Arsenic and lead	see Table	per analytical method	per analytical method	biased/judgmental sampling based on professional judgment of the sampling team	100%; Soil samples from surface soil sample locations are critical samples.	Standardized procedures for sample collection and analysis will be used.	See Section 2.3 of QAPP form.	See Section 2.10 of QAPP form.			

APPENDIX A

SITE-SPECIFIC INFORMATION FOR A SITE INVESTIGATION AT THE UNITED ZINC NO. 1

INTRODUCTION

The Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) has been tasked by the U.S. Environmental Protection Agency (EPA) Region 7 Superfund Division to conduct additional Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Site Investigation (SI) activities at the United Zinc No. 1 site in Iola, Allen County, Kansas.

The purpose of these activities is to determine whether any threats to human health or the environment exist as a result of releases to soil, groundwater, and surface water. This Quality Assurance Project Plan (QAPP) identifies site-specific features and addresses elements of the sampling strategy and analytical methods proposed for this investigation.

SITE LOCATION/DESCRIPTION

United Zinc is located within the city boundaries of Iola, Allen County, Kansas, on the north side of Highway 54 along Kansas Drive, and is the location of the former United Zinc and Chemical Company Zinc and Lead Smelter. The facility is located on the east side of Iola within a mixture of residential and commercial properties. United Zinc is located in Sections 25 and 36 of Township 24 South, Range 18 East (Kansas Department of Health and Environment [KDHE] 2005), as depicted on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map of Iola, Kansas (USGS 1984). The approximate geographic coordinates for the central portion of the facility are 37.9222800 degrees north latitude and 95.385900 degrees west longitude (Maxim Technologies, Inc. [Maxim] 2003). The location of the facility is shown in Appendix A, Figure 1.

The former United Zinc smelter facility was comprised of 10 parcels of land, equivalent to approximately 17 acres, but the overall site area evaluated includes a much larger surrounding section. The property has been graded, leveled, and developed since the former smelter operations ceased in the 1920s (Maxim 2003). Most of the property where the former smelter was located is vacant but includes the following businesses: Brenntag Southwest, Inc. (Chemical Distribution Company), a MFA Distributor, the Superflea Flea Market, Tucker's Flea Market, a portion of a concrete mixing facility, and some pastureland (Maxim 2003, KDHE 2005). The facility is bordered on the north by residential properties; on the east by the East Iola Site (the location of the former Prime Western Smelting Company Works No. 3 and J.B. Kirk Gas and Smelting Company), a car wash, a former Tyson processing facility, and a movie theater; on the south by a restaurant, a dry cleaner, a car dealership, and agricultural land; and on the west by the Colberly Site (the location of the former United Iron Works Company), a truck repair facility, and

the remaining portion of the concrete mixing facility (Maxim 2003). The facility is also surrounded by residential neighborhoods and six schools (KDHE 2005). Investigations have focused specifically on the Iola Preschool for the Exceptional (Iola Preschool) is located northeast of United Zinc, and the McKinley Elementary School (McKinley School) located southwest of United Zinc (Terranext 2005). The facility layout is shown in Appendix A, Figure 2.

According to the historic plat maps and Sanborn fire insurance maps, activities at the United Zinc facility began as early as 1901. At that time, the facility was called the Standard Acid Company and included three furnaces, 12 retorts, and a pottery room with kilns. Mr. William Lanyon owned the property between 1901 and 1902. The property was transferred to United Zinc in 1902. United Zinc and Chemical Company owned and operated the primary zinc smelter until approximately 1912. No known active smelting facilities were documented on the property after 1912. Historical documentation indicates that the United Zinc facility contained four furnaces, eight kilns, 14 retorts, and several ore crushers and roasters (KDHE 2005). The United Zinc facility was designed to capture the sulfur dioxide fumes generated during roasting the ore to make sulfuric acid; therefore, United Zinc likely used the acid chambers associated with the Standard Acid facility (KDHE 2006).

During a 2003 Phase I site reconnaissance, smelter waste was observed at United Zinc, and the quantity was estimated as approximately 1,800 cubic yards concentrated in the southwest corner of the vacant property at United Zinc (Burns & McDonnell Engineering Company Inc. [Burns & McDonnell] 2004, Terranext 2005). Zinc smelter waste is known to contain elevated concentrations of heavy metals from smelting activities—including arsenic, cadmium, lead, and zinc. Sampling of the soil, groundwater, sediment, surface water, smelter waste, and surrounding areas began in 2004 to determine the potential impact from the former smelting operations at United Zinc.

The EPA has tasked Tetra Tech to perform additional sampling as part of the SI to determine background concentrations of arsenic and lead in the surface soil, and to identify impacts to the groundwater and surface water pathways. Investigations to identify the levels of arsenic and lead in residential yards near the former United Zinc facility are continuing under the SI, but background concentrations in the area have yet to be defined. The additional sampling will include surface soil east of the United Zinc facility in an area without existing industrial and commercial facilities. In addition existing private drinking water wells, surface water intakes that provide drinking water to the City of Iola, and surface water and sediment samples from Rock Creek and Elm Creek will also be collected to evaluate the surface water pathway.

ENVIRONMENTAL SETTING

Iola is located within the Upper Neosho Watershed. The City of Iola obtains their drinking water from surface water according to the EPA's Safe Drinking Water Information System. No drinking water violations have been reported for the City of Iola since October 2005. Violations noted since 1992 included exceedences of total haloacetic acids, total trihalomethanes, and total coliform. The City of Iola responded to each health based violation and compliance was achieved (EPA 2007).

Allen County is located within the Osage Plains, and the land is predominantly level with few outstanding differences in the relief of the land. The U.S. Department of Agriculture (USDA) has classified soil in the area as Kenoma silt loam. The Kenoma soil type is described by the USDA as deep, moderately well-drained, very slowly permeable soils on the uplands. These soils are formed in material weathered from sediments high in content of silt and clay (USDA 1978).

PREVIOUS INVESTIGATIONS

Previous investigations at the United Zinc facility are as follows:

- A Phase I Focused Former Smelter Assessment (FFSA) was completed on behalf of the KDHE State Water Plan (SWP) program in December 2003. The FFSA identified a Recognized Environmental Condition (REC) at United Zinc based on observation of smelter waste during the site reconnaissance. The smelter waste appeared to have impacted the vegetative growth in the area of the former smelter operations. In addition, elevated concentrations of lead had been previously documented in the surface soils on the property immediately adjacent to United Zinc from other documented smelting operations, including the East Iola Site and the Colberly Site. A Phase II Assessment was recommended at United Zinc and in the area surrounding the smelting activities to investigate the potential risk of human exposure to heavy metal-impacted waste and surface soil (Maxim 2003).
- Sampling of the soil, smelter waste, groundwater, surface water, and sediment was
 conducted during the Phase II FFSA at United Zinc in December 2004 on behalf of the
 KDHE SWP. The sampling identified elevated levels of arsenic, cadmium, lead, and zinc
 above the background soil sample concentrations. The Phase II FFSA also indicated

- potential contamination near residents and at both the McKinley School and the Iola Preschool (Burns & McDonnell 2004, KDHE 2005).
- KDHE collected samples in June 2005 from 50 residential yards located between United Zinc and the McKinley School and the Iola Preschool. Arsenic was detected above its KDHE Risk-Based Standards for Kansas (RSK) Residential Soil Pathway level of 11 milligrams per kilogram (mg/kg) in 18 of the residential samples (Terranext 2005, KDHE 2003). In addition, lead was found above its KDHE RSK Residential Soil Pathway level of 800 mg/kg in 12 of the residential samples, some of the same samples with elevated arsenic concentrations. Cadmium and zinc were detected in all of the soil samples at concentrations below their KDHE RSK Residential Soil Pathway values (Terranext 2005, KDHE 2003, 2005).
- A Preliminary Removal Site Evaluation (RSE) was conducted by KDHE in September 2005. In support of the 2005 RSE, KDHE collected additional samples from sensitive receptors areas near United Zinc, including the McKinley School and Iola Preschool. The results exhibited elevated levels of arsenic, cadmium, lead, and zinc at residential and non-residential properties. The presence of lead above 400 mg/kg was also identified within the McKinley School playground and adjacent areas. The Preliminary RSE recommended further removal site evaluation and removal action consideration (KDHE 2005).
- Tetra Tech START, under contract to the EPA, prepared a RSE report in September 2006. The sampling activities for the RSE were conducted during April and May 2006. During the RSE, approximately 260 properties were screened for lead using a XRF, and approximately 10 percent of the screened samples were submitted for laboratory confirmation analyses of arsenic, barium, cadmium, lead, and zinc. Thirty-four properties were identified where XRF and/or laboratory data indicated lead concentrations warranted a time-critical removal action (400 mg/kg for schools and daycares; 800 mg/kg for residential properties; and 1,000 mg/kg for commercial properties). The 34 properties included 19 private residences, 10 daycare facilities, two elementary schools, and three commercial properties (Tetra Tech 2006). In addition, 65 residential samples collected during the RSE contained concentrations of lead between 400 mg/kg and 800 mg/kg.

Contaminants potentially released at the site include the following:

• Metals – according to historical documents of the zinc smelting industry, smelting operations were known to generate large amounts of soot from burning coal, which was generally contaminated with elevated levels of lead, cadmium, arsenic, and zinc. In addition, the smelting operations generated large volumes of smelter waste, including impure smelting slag and slag blown from the retorts at the end of the smelting process that also contained heavy metals.

SAMPLING STRATEGY AND METHODOLOGY

The sampling activities are tentatively scheduled to begin in March 2007, and will require approximately three days to complete. The laboratory data obtained for all samples collected during this project will be compared to all applicable or relevant and appropriate requirements (ARAR) to assess whether further response is warranted.

Groundwater Sampling

Groundwater samples will be collected from five private drinking water wells (including one background location) (see Appendix B, Figure 3). At this time, Tetra Tech START has not received permission to sample all the wells; however, the intention is to gain permission and to sample these wells. Groundwater samples from the drinking water wells will be collected from taps/spigots located nearest the well heads, prior to any treatment systems. The system lines at active wells will be purged for approximately 5 minutes before the samples are collected. Any wells not currently in use will be purged for at least 15 minutes prior to sampling. Water quality parameters (pH, conductivity, and temperature) will be recorded as each well is purged until the parameters stabilize.

A field sheet will be completed for each groundwater sample location. The field sheets will include the following information: water quality parameters, purge times or estimated purge volumes, property ownership information, exact sample locations (depths and GPS coordinates), and analyses to be performed. The groundwater samples will be submitted to the EPA Region 7 laboratory for analyses of arsenic and lead. Water samples for metals analysis will be collected in 1-liter containers and preserved with nitric acid (HNO₃) to a pH <2. All water samples will be stored in coolers maintained at or below 4 C pending submittal to the EPA Region 7 laboratory.

5

Surface Water Sampling

Surface water samples will be collected from three surface water intakes used by the City of Iola to provide drinking water to the City (including one background location) (see Appendix B, Figure 3). At this time, Tetra Tech START has not received permission to sample the surface water intakes; however, the intention is to gain permission and to sample these intakes. Surface water samples from the water supply intakes will be collected from taps/spigots located nearest the intake, prior to any treatment systems. The system lines at active wells will be purged for approximately 5 minutes before the samples are collected. Water quality parameters (pH, conductivity, and temperature) will be recorded as each well is purged until the parameters stabilize.

A field sheet will be completed for each surface water sample location. The field sheets will include the following information: water quality parameters, purge times or estimated purge volumes, property ownership information, exact sample locations (depths and GPS coordinates), and analyses to be performed. The surface water samples will be submitted to the EPA Region 7 laboratory for analyses of arsenic and lead. Water samples for metals analysis will be collected in 1-liter containers and preserved with nitric acid (HNO₃) to a pH <2. All water samples will be stored in coolers maintained at or below 4 C pending submittal to the EPA Region 7 laboratory.

Soil Sampling

Surface soil samples will be collected and screened in the field at approximately five residential properties to determine the background concentrations of arsenic and lead in Iola in an area east of the former United Zinc facility. At each property, after receiving consent from the owner, Tetra Tech START will divide the property into distinct cells for screening purposes. While the maximum size of a cell will be 100 by 100 feet, the actual size of cells will be determined in the field based on site features. A cell will extend from the circumference defined by the drip zone around the building or house in all directions 100 feet or to the property line, whichever distance is shorter. Additional areas or cells to be screened include: the drip zone; fine-grained material if used for driveways, sidewalks, or under carports; vegetable gardens; and children's play areas at least 25 by 25 feet. A composite sample consisting of nine aliquots, each collected from 0 to 2 inches below ground surface (bgs), will be collected in each cell and placed in a labeled, sealed plastic bag.

Three separate readings for the metals of interest will be taken of each homogenized sample using a field portable x-ray fluorescence (XRF) analyzer; these readings will be recorded in the appropriate cell on the

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field sheet for that property. The average of these three readings will be calculated and also recorded on the field sheet. All of the screened samples will be collected in an 8-ounce jar and will be submitted for laboratory confirmation analyses of arsenic and lead. All soil samples will be stored in coolers maintained at or below 4° C pending submittal to the EPA Region 7 laboratory.

Surface Water and Sediment Sampling

Runoff from the former United Zinc facility drains to the east to Rock Creek. Rock Creek flows to the south and drains into Elm Creek which leads to the confluence of the Neosho River. Two drinking water intakes exist 8 miles downstream of United Zinc, on the Neosho River. Surface water and sediment samples will be collected from Rock Creek, and Elm Creek, as shown in Figure 3 in Appendix B. A background surface water and sediment sample will be collected from Rock Creek upgradient of the former United Zinc facility. At each location, the surface water sample will be collected prior to the collection of the sediment sample. Water samples will be collected by immersing the sample containers directly into the water, whenever possible. All sampling procedures will follow the guidelines established in the EPA Standard Operating Procedures (SOP) identified in the QAPP.

Surface water samples will be submitted to the EPA Region 7 laboratory for analysis of arsenic and lead. Water samples to be analyzed for total metals will be collected in 1-liter containers and preserved with HNO₃ to a pH <2.

Sediment samples will be collected from the top 6 inches of stream sediment with a disposable stainless-steel spoon. The sediment will be placed in a disposable aluminum pie pan for homogenization and then transferred to an 8-ounce jar for analysis of the metals.

Pertinent data, including analyses to be performed and sample location data, will be recorded on field sheets for each sample. All surface water and sediment samples will be stored in coolers maintained at or below 4°C pending submittal to the EPA Region 7 laboratory.

A summary of all anticipated samples for this project is in Table 1 of the attached QAPP form. A summary of data quality objective summaries for this project is in Table 2 of the attached QAPP form. The SOPs and chain-of-custody procedures referenced in the QAPP will be followed throughout the sampling activities to verify the integrity of the samples from the time of collection until they are submitted to the laboratory for analysis.

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Disposal of investigation-derived wastes (IDW) and procedures for equipment and personal decontamination will be addressed in a site-specific health and safety plan prepared by Tetra Tech START. IDW is expected to consist of disposable sampling supplies (gloves, paper towels, polyvinyl chloride liners, pie pans, etc.) that will be disposed of off site as uncontaminated solid waste.

Quality Control Samples

An off-site location will be selected for collecting background samples of soil, groundwater, surface water, and surface water and sediment. To evaluate sample quality control (QC), a field blank will be collected, as specified in Section 2.5 of the QAPP form.

ANALYTICAL METHODS

All samples will be submitted to the EPA Region 7 laboratory in Kansas City, Kansas, for analysis. The water samples will be analyzed for arsenic and lead. All samples will be analyzed according to SOP and methods referenced on the QAPP form. Standard detection limits for those methods will be adequate for this project. Appropriate containers and physical/chemical preservation techniques will be employed during the field activities to help verify that representative analytical results are obtained. An Analytical Services Request form has been completed by the Tetra Tech START Project Manager and submitted to the EPA Region 7 laboratory. Submittal of samples to the laboratory is expected in March 2007.

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APPENDIX A
FIGURES

